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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

JESSICA MARTINEZ-ARRIAGA, an individual,

Plaintiff,  
v.

BRIGGS MANAGEMENT LLC, d/b/a and a/k/a Fat Tuesday; BRIGGS MANAGEMENT, INC., d/b/a and a/k/a Fat Tuesday; and DOES 1 through 50, inclusive,

Defendants.

Case No.: 2:23-cv-01845-JAD-NJK

**STIPULATION AND ORDER TO EXTEND  
TIME FOR PLAINTIFF'S RESPONSE TO  
DEFENDANTS' MOTION FOR SUMMARY  
JUDGMENT**

**(THIRD REQUEST)**

Plaintiff, JESSICA MARTINEZ-ARRIAGA, by and through her counsel of record, RAFII & ASSOCIATES, P.C., and Defendants BRIGGS MANAGEMENT INC. AND BRIGGS MANAGEMENT LLC, ("Defendants") by and through their counsel of record, the law firm of LEWIS BRISBOIS BISGAARD & SMITH LLP, submit the following Stipulation to Extend Time for Plaintiff's Response to Defendants' Motion for Summary Judgment:

1. The Court granted the Parties' first stipulation on July 24, 2024, extending the time for Plaintiff's response from July 29, 2024, to August 5, 2024. [ECF No. 41.]

2. On July 31, 2024, the Court granted the Parties' second stipulation on July 30, 2024, extending the time for Plaintiff's response from August 5, 2024, to August 14, 2024. [ECF No. 43.]



1           3.       The Parties' second stipulation [ECF No. 42] is incorporated herein by reference. As  
2 explained in the Parties' second stipulation, Plaintiff's lead counsel Jason Kuller is with his long-term  
3 partner at the Cleveland Clinic in Ohio while she undergoes testing and treatment for a rare and  
4 debilitating medical condition. Mr. Kuller's partner is currently unable to ambulate without a  
5 wheelchair or seated rollator, and relies on Mr. Kuller as her primary caregiver.

6           4.       Mr. Kuller's partner has new appointments and tests scheduled this week at the  
7 Cleveland Clinic and is currently scheduled to meet with a specialist at the University of Utah on  
8 Friday, August 16, 2024. As a result of his caregiving responsibilities, Mr. Kuller has been unable to  
9 devote sufficient time to brief Plaintiff's opposition to Defendants' summary judgment motion. Mr.  
10 Kuller expects to return to Las Vegas on Saturday, August 17, 2024, and anticipates being able to  
11 complete Plaintiff's response no later than Friday, August 23, 2024. Plaintiff's counsel will file her  
12 opposition earlier, if possible.

13           5.       Plaintiff's counsel thus needs additional time to prepare and finalize Plaintiff's  
14 opposition, and Defendants' counsel has graciously agreed to the additional extension.

15           6.       This is the third request for an extension of time for Plaintiff to file her response to  
16 Defendants' Motion for Summary Judgment.

17           7.       This request is made in good faith and not for the purpose of delay. WHEREFORE,  
18 the Parties respectfully request that this Court **extend the time for Plaintiff to**  
19 **file her Opposition to Defendants' Motion from August 14, 2024, to August 23, 2024.**

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1 RESPECTFULLY SUBMITTED BY THE FOLLOWING COUNSEL OF RECORD:

2 **DATED this 12th day of August, 2024.**

**DATED this 12th day of August, 2024.**

3  
4 LEWIS BRISBOIS BISGAARD & SMITH LLP

RAFII & ASSOCIATES, P.C.

5 /s/ Jeffrey D. Winchester

/s/ Jason Kuller

6 JEFFREY D. WINCHESTER

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9 Attorneys for DEFENDANTS BRIGGS  
10 MANAGEMENT LLC and BRIGGS  
11 MANAGEMENT, INC.

Attorneys for PLAINTIFF  
JESSICA MARTINEZ-ARRIAGA

12  
13 **ORDER**

14 Based on the parties' stipulation [ECF No. 44] and good cause appearing, IT IS  
15 ORDERED that the deadline to respond to defendants' motion for summary judgment is extended  
16 to August 23, 2024.

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18 U.S. District Judge Jennifer A. Dorsey  
Dated: August 13, 2024

